

Slide 1



Metropolitan Telecommunications

New Jersey 271 Filing Issues



Overview

- Effective competition is predicated on operational viability
- Verizon's New Jersey systems are not effectively operationally viable
- The result of these problems are barriers to effective competition



OSS Issues

- A part of the Pennsylvania 271 process OSS weaknesses were identified
- These issues are greater in New Jersey (where the OSS systems are identical except the Service Order Processor)
- New Jersey Confirmation/Reject Response times are operationally non-viable



OSS Issues Chart 1: LSRC/Reject Analysis

**Comparison of Responses (Local Service Request Confirmation/Reject)
Between New Jersey and Pennsylvania (For the months of June, July,
August and October 2001 through 10/26/01)**

	Average Hours From Send to LSRC/Reject	Standard Deviation in Hours From Send to LSRC/Reject	Hours to Achieve 50% Response	Hours to Achieve 95% Response
New Jersey	19 Hr 29 Min	82 Hrs 55 Min	1 Hr 44 Min	89 Hr 56 Min
Pennsylvania	6 Hr 19 Min	31 Hrs 7 Min	0 Hr 31 Min	21 Hr 33 Min
Time Differential Between PA and NJ	13Hr 10Min	51Hr 48Min	1Hr 13Min	68Hr 23Min
% Differential Between NJ & PA (I.e. NJ as a % of PA)	308.44%	266.47%	335.48%	417.32%



OSS Issues (Continued)

- Delayed Confirmations/Rejects result in CLEC inability to provide information to End Users
- Delayed Confirmations/Rejects result in CLEC inability to promptly engage in activities necessary to migrate or service the End User
- Delayed Confirmations/Rejects result in a loss of End User confidence in the CLEC as a quality service provider



OSS Issues (Continued)

- Verizon's New Jersey Completion Notices require twice as much time to arrive as Pennsylvania's
- Verizon requires 48 + days to transmit 95% of NJ Billing Completion Notices (BCN) after the work has been completed
- Verizon requires 31 + days to complete 95% of NJ Billing Completion Notices (BCN) after the work has been completed



OSS Issues (Continued)

- Absent the BCN generation End User usage is not properly accrued
- Absent the BCN generation, the Loss of Line Report to the losing carrier is not generated
- Absent the BCN generation, the gaining carrier cannot engage in subsequent transactions



OSS Issues (Continued)

- The result of delayed BCN generation and transmittal is double billing
- The result of delayed BCN generation and transmittal is inordinately high End User bills when the delayed usage is transmitted
- The result of delayed BCN generation and transmittal is CLEC inability to engage in service transactions



OSS Issues (Continued)

- The result of delayed BCN generation and transmittal is an End User impression of the CLEC as a unreliable service provider with higher bills than promised



OSS Issues Chart 2: System Transaction Comparison

Comparison of System Transactions Between New Jersey and Pennsylvania (For the Months of June, July, August and October 2001 through 10/26/01)

	Average Days Between PCN CD and PCN Receipt	Standard Deviation in Days Between PCN CD and PCN Receipt	50% (In Days)	95% (In Days)	Average Days Between PCN CD and BCN Receipt	Standard Deviation in Days Between PCN CD and BCN Receipt	50% (In Days)	95% (In Days)	Average Days Between PCN CD and BCN CD	Standard Deviation in Days Between PCN CD and BCN CD	50% (In Days)	95% (In Days)	Average Days Between BCN CD and BCN Receipt	Standard Deviation in Days Between BCN CD and BCN Receipt	50% (In Days)	95% (In Days)	Average Days Between PCN and BCN	Standard Deviation in Days Between PCN and BCN	50% (In Days)	95% (In Days)
New Jersey	1	6.1	0	4	5	5.5	4	48+	4	3.8	4	31+	1	3.3	0	34+	4	7.7	4	45+
Pennsylvania	0	2	7	76	2	2.5	1	7	2	1.3	1	4	0	2.1	0	0	2	3	1	6
Time Differential Between PA and NJ (In Days)	1	4.1	-7	-72	3	3	3	42+	2	2.5	3	27+	1	1.2	0	34+	2	4.7	3	39+
% Differential Between NJ & PA (i.e. NJ as a % of PA)	100.00%	305.00%	0.00%	5.26%	250.00%	220.00%	400.00%	685.71+%	200.00%	292.31%	400.00%	775+%	100.00%	157.14	0.00%	100.00%	200.00%	256.67%	400.00%	750+%



OSS Issues (Continued)

- The notifiers transmitted by Verizon certify the work requested has been completed, analysis of the expected results indicates this is not the case
- CLECs have no other information source as an alternative to the Verizon notifiers and must rely upon them
- CLECs incur significant costs (time & money) to identify and remediate the “false” notifiers
- Issues which arise during the identification/ remediation period cause the CLEC to appear (to the End User) to be a low quality provider



OSS Issues (Continued)

- 19% of End User Migrations to MetTel were not completed as per the BCN (8% showed usage commencing 3 days after the work completion date and 11% showed no usage)
- MetTel examines usage based on the Usage Record Date i.e. the date the End User incurred the usage as presented on the Verizon Daily Usage File
- This usage is utilized to verify the validity of the completion notifier by testing for the expected result



OSS Issues (Continued)

- 11.5% of PIC Change transactions show usage to a predesignated carrier other than the one indicated on the Verizon BCN
- 5% of MetTel customers show a PIC change with no MetTel transaction to initiate it
- MetTel verifies the PIC change by examining Cat 11 (Carrier Access Usage) records to test that the terminating IXC is the selected one



OSS Issues (Continued)

- When Verizon Notifiers are delayed and MetTel issues a Trouble Ticket requesting information, Verizon does not respond with the information in a commercially viable timeframe
- Verizon only resolved 60% within 3 days
- Of the remaining 40%, Verizon provided incorrect information for 30% of the PCN and 83% of the BCN
- Verizon required 39+ days to resolve 87% of the MetTel Trouble Tickets



OSS Issues Chart 3: Migration Quality Issues

Migration Quality Analysis

For the months of June, July, August and October 2001 through 10/26/01

Period	Usage Starting 3 Days from PCN CD	Usage Starting 7 Days from PCN CD	No Usage as of October 26, 2001 but greater than 7 Days from Migration	Total Late and no Usage
	%	%	%	%
NJ	7.97%	4.12%	10.99%	18.96%



**OSS Issues Chart 4 A:
Trouble Ticket Status Issues**

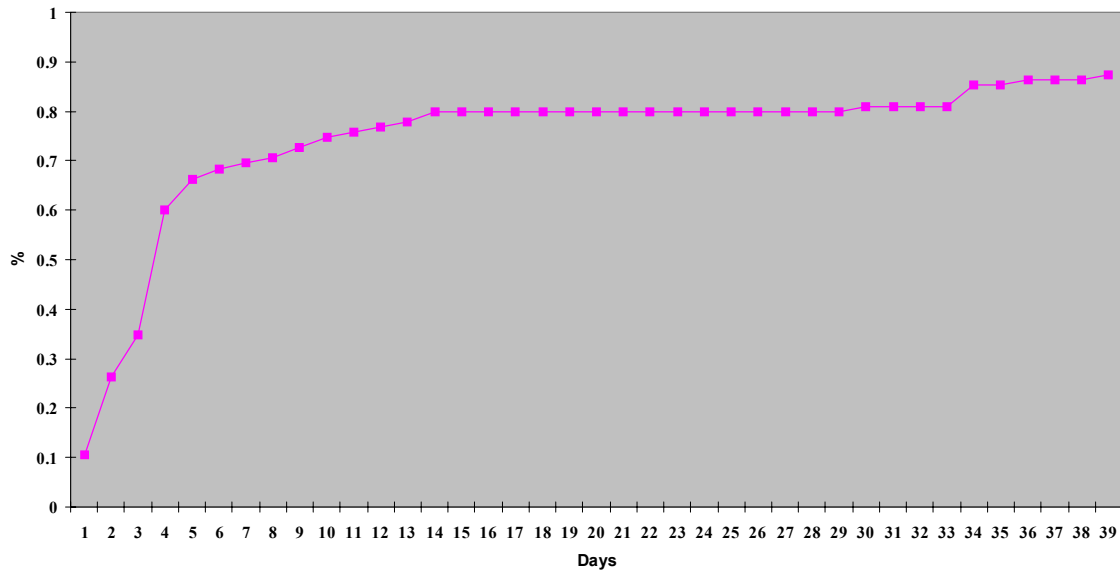
**New Jersey Trouble Ticket Status -June, July, August and
October 2001 through 10/29/01**

Solved in 3 Business Days	Solved in More Than 3 Business Days	Not Solved	Total not Solved in 3 Business Days
%	%	%	%
60.00%	27.37%	12.63%	40.00%



OSS Issues Chart 4 B: Trouble Ticket Aging

Days To Resolve Trouble Tickets





OSS Issues Chart 5 A: Missing Notifier Analysis Issues

Analysis of Missing Completion Notifiers (BCN,PCN) Which Were Provided More Than 3 Business Days From the Trouble Ticket

As of 10/26/01

Analysis By Verizon Provided Notifier

Answers provided by Verizon to TT	Requested Notifier	% of Items where FOC CDD is Prior to TT Initiation by	% of Items where Completion Date is Prior to TT	% of Items on PCD Report	Remarks
CONFIRMED	PCN	100.00%	66.67%	0.00%	
	BCN	N/A	N/A	N/A	
PROVNOT	PCN	100.00%	100.00%	0.00%	Waited 4 Days For Reflow
	BCN	100.00%	100.00%	0.00%	
COMPNOT	PCN	100.00%	100.00%	0.00%	Waited More Than 50 Days For Reflow
	BCN	100.00%	100.00%	0.00%	Waited 10 Days For Reflow
No Answer Provided	PCN	N/A	N/A	N/A	
	BCN	100.00%	100.00%	0.00%	
Total		100.00%	98.39%	0.00%	

(1) Data is presented for PONs that have received at least one Completion Notifier



OSS Issues Chart 5 B: Missing Notifier Analysis Issues

Analysis of Missing Completion Notifiers (BCN,PCN) Which Were Provided More Than 3 Business Days From the Trouble Ticket

Answers provided by Verizon to TT	Requested Notifier	% of Items where FOC CDD is Prior to TT Opening By Type of Requested Notifier		% of Items where Completion Date is Prior to Trouble Ticket Initiation By Type of Notifier		Status Provided					
						Status Provided is at a Lower Level than the Requested Notifier Or No Status Provided		Status Provided is the Level of the Requested Notifier		Status Provided is at a Higher Level than the Requested Notifier	
		Provisioning Completion Notifier	Billing Completion Notifier	Provisioning Completion Notifier	Billing Completion Notifier	Provisioning Completion Notifier	Billing Completion Notifier	Provisioning Completion Notifier	Billing Completion Notifier	Provisioning Completion Notifier	Billing Completion Notifier
CONFIRMED	PCN	30.00%		20.00%		30.00%					
	BCN		0.00%		0.00%		0.00%				
PROVNOT	PCN	10.00%		10.00%				10.00%			
	BCN		80.77%		80.77%		80.77%				
COMPNOT	PCN	60.00%		60.00%						60.00%	
	BCN		17.31%		17.31%				17.31%		
No Answer Provided	PCN	0.00%		0.00%		0.00%					
	BCN		1.92%		1.92%		1.92%				
Total	PCN	100.00%		90.00%		30.00%		10.00%		60.00%	
	BCN		100.00%		99.81%		82.69%		17.31%		



OSS Issues Chart 6 A: PIC Change Analysis Issues

As of October 31, 2001

CIC Change Quality - First Call Analysis

Category		First CIC as Requested to 5237	First CIC not as Requested	No CIC Record
		%	%	%
First Call Analysis	First CIC after CIC Change by PON	55.30%	11.46%	33.24%
	First CIC after CIC Change by TN	45.14%	8.24%	46.62%

Long Distance Quality - Call Analysis

All Calls routed to AYG	Call Routed to Different CIC and never Changed	Calls Routed to Different CIC and later Changed to AYG	Calls Routed to AYG and later Changed to Different CIC	Mixed Usage	NO Pre-Designated Call Record
WTN %	WTN %	WTN %	WTN %	WTN %	WTN %
39.16%	6.91%	0.14%	4.61%	2.44%	46.61%



OSS Issues Chart 6 B: PIC Change Analysis Issues

Call Distribution per CIC

CIC	%
Total Requested 5237	74.45%
Total not as Requested *	25.55%

* Total of other Carriers is 10

Local Usage for TNs with no LD Usage

Have Local Usage	Do not have Local Usage
%	%
82.61%	17.39%



Verizon Non Responsiveness Issues

- The New Jersey Board of Public Utilities decision was based on incomplete data
- Verizon disputed MetTel's usage analysis but were unable/unwilling to support their comments
- MetTel demonstrated that some Verizon testimony was inaccurate and submitted a motion to compel that Verizon either produce their supporting documentation or withdraw the testimony: the BPU ruled on this motion only after the conclusion of the final briefing schedule



Verizon Non Responsiveness Issues

- Verizon disputed MetTel's analysis of Verizon's responses to Trouble Tickets but was unable to provide any support for their assertions
- The NJBPU did not react to MetTel's illustration of this non responsiveness



Conclusion

- MetTel is NOT addressing the Usage issue as an item of missing records to be addressed from a Billing perspective
- Rather, it is used as a methodology to test and verify expected results based on the transactions Verizon purports as correctly completed
- This analysis highlights serious deficiencies in Verizon's OSS which preclude effective competition



Conclusion (continued)

- The NJBPU Consultative Report is based on incomplete information
- MetTel's unique analyses demonstrate that Verizon's OSS requires remediation before it is adequate for open and free competition